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**Via ECF and Facsimile (212) 805-6737**

February 16, 2018

Honorable George B. Daniels  
United States District Judge  
United States Courthouse, Room 1310  
500 Pearl Street  
New York, New York 10007

Re: K7 Design Group, Inc., et al. v. Fashion Angels Enterprises, Inc., et al.  
Case 1:17-cv-06943-GBD

Dear Judge Daniels:

Our firm represents the Defendants in the above-referenced matter. Pursuant to FRCP 12(a)(4)(A), Defendants' time to answer, move or otherwise respond to the amended complaint in this action is February 21, 2018 following your decision on the partial motion to dismiss on February 7, 2018. You granted Plaintiffs leave to serve a letter application by February 23, 2018 for leave to file a second amended complaint in this action.

The parties have agreed to extend the Defendants' time to answer, move or otherwise respond to the amended complaint to February 28, 2018 and this is the first request to extend this deadline after the Court's decision on the partial motion to dismiss.

Accordingly, we respectfully request that the attached stipulation be so-ordered. If you have any questions, please feel free to contact me.

Respectfully submitted,

Carl F. Regelman

cc: Hilary A. Dinkelspiel, Adam Katz (Via E-mail and ECF)  
GOLDBERG SEGALLA LLP  
711 Third Avenue, Ste. 19  
New York, New York 10017

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
K7 DESIGN GROUP, INC. and ISAAC KAPLAN,

Plaintiff,

-against-

FASHION ANGELS ENTERPRISES, INC., GOLDI  
MILLER, MARK MILLER, MYRA MOULOUDJI, and  
MARK RINCON,

Defendants.

No. 17 Civ. 06943 (GBD)

**STIPULATION AND  
PROPOSED ORDER ON  
EXTENDING TIME TO  
RESPOND TO AMENDED  
COMPLAINT**

**WHEREAS**, the Court decided a partial motion to dismiss the amended complaint on February 7, 2018; and

**WHEREAS**, Defendants' time to answer the amended complaint in this action is February 21, 2018 pursuant to FRCP 12(a)(4)(A); and

**WHEREAS**, the Court granted Plaintiffs leave to serve a letter application by February 23, 2018 for leave to file a second amended complaint in this action;

**IT IS HEREBY STIPULATED AND AGREED**, by and between the parties, through their undersigned counsel that the Defendants' time to answer, move or otherwise respond to the amended complaint in this action shall be extended to February 28, 2018, and this is the first request to extend this deadline after the Court's decision on the partial motion to dismiss; and

**IT IS FURTHER STIPULATED** that this stipulation may be executed in one or more counterparts, each of which shall be deemed an original and all of which together shall be deemed one instrument. Electronic or other copies of this stipulation shall be deemed valid and original.

**GOLDBERG SEGALLA LLP**

*Attorneys for Plaintiffs*

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By: 

Adam S. Katz

Hilary A. Dinkelspiel

Dated: 2/16/18

**TANNENBAUM HELPERN**

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By: 

Carl F. Regelmann

Dated: 2/16/18

SO ORDERED \_\_\_\_\_